



DEVELOPMENT and ENGINEERING ADVISORY BOARD

May 18, 2016

Clark County Board of Councilors
Attn: Jennifer Clark
P.O. Box 5000
Vancouver, WA 98666-5000

Re: Comprehensive Plan Update

To the Board of County Councilors,

The Development and Engineering Advisory Board (DEAB) has reviewed documents and proposals regarding the current Comprehensive Plan Update. We have provided feedback throughout the process. However, the board wanted to reiterate a few of our main comments and concerns on the plan.

- 1) Members of the board previously expressed concern regarding the assumed infrastructure deduction percentage used to develop the plan. The assumed infrastructure deduction percentage rate is 27.7% for residential and 25% for Commercial and Industrial. This rate has not changed with updated stormwater ordinances. While these assumptions may be appropriate in areas of well-draining soils, we believe they underestimate the impact in areas of poorly draining soils which is where most of the undeveloped portion of the urban growth area is located. The average infrastructure percentage in the 8 examples we previously looked at was about 36.2%. It should be noted that not all land brought into the urban growth boundary is in poorly drained soil. But based on a weighted average, 32-35% is likely a more accurate range for the assumed Infrastructure Percent Deduction. Please see DEAB Letter in the record from July 2014 for additional information.
- 2) The DEAB also expressed concerns regarding the adopted 1.12% growth rate. Recent data from the US Census Bureau shows the county growing at 1.7% annually. The very low adopted rate results in very little land added to the supply. The county is not designating sufficient land to accommodate the growing demand for housing. While we understand it is too late to adjust now and still hit the deadline, we would like to see a commitment to revisit this as soon as possible and amend the plan. It is important to note that the low land supply drives prices up contributing to the local housing affordability crisis in Clark

County. For additional information, please see memos in the record from Jamie Howsley from May 2016, June 2015, March 2015, and July 2014

- 3) The DEAB expressed concerns regarding the proposed park impact fees. In particular, they expressed concern regarding the high land values used in the calculation. They also recommended phasing in any increase with smaller incremental increases over a longer period of time. Concerns were also raised regarding their effects on housing affordability. Please see DEAB Letter in the record from May 2016 for additional information.
- 4) The DEAB expressed similar concerns in their meetings regarding the increased School impact fees in some jurisdictions. In particular, they had concerns regarding their effects on housing affordability. They also discussed phasing in any increase with smaller increases over a longer period of time.

Prepared by DEAB
May 18, 2016